

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Patrice Neil,

Plaintiff,

Case No.: 24-cv-5901

v.

Credence Resource Management, LLC,

Defendant.

/

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant, Credence Resource Management, LLC (“CRM”), hereby removes the above captioned civil action from the Civil Court of the City of New York, County of Bronx, to the United States District Court for the Southern District of New York. The removal of this civil action is proper because:

1. On July 8, 2024, plaintiff, Patrice Neil, commenced a civil action by filing a Summons and Endorsed Complaint in the Civil Court of the City of New York, County of Bronx, entitled and captioned as *Patrice Neil v. Credence Resource Management, LLC*, Index No. CV-010559-24/BX (hereinafter the “State Court Action”). No further proceedings before the State Court have occurred.
2. In plaintiff’s Endorsed Complaint, plaintiff alleges statutory causes of action against CRM. A true and correct copy of the Endorsed Complaint is attached hereto as Ex. “A.”.

3. Plaintiff accuses Defendant of violating the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* Plaintiff has also asserted state law claims.

4. Defendant received plaintiff's Summons and Endorsed Complaint on or about July 15, 2024.

5. This Court has jurisdiction over plaintiff's claims pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claims are founded on a claim or right arising under the laws of the United States. This Court has supplemental jurisdiction over plaintiff's joined state law claims pursuant to 28 U.S.C. § 1337.

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date defendant CRM received plaintiff's Summons and Complaint. *See* 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the Civil Court of the City of New York, County of Bronx. *See Ex. "B."*

8. Written notice of this Notice of Removal of this action is being caused to be served on the Plaintiff.

WHEREFORE, Defendant, Credence Resource Management, LLC, gives notice that this action is removed from the Civil Court of the City of New York, County of Bronx to the United States District Court for the Southern District of New York.

Dated: August 2, 2024

Respectfully Submitted,

/s/ Aaron R. Easley
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Attorneys for Defendant,
Credence Resource Management, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024, a copy of the foregoing was electronically filed with the Clerk of the Court, United States District Court for the Southern District of New York, and served via U.S. Mail upon the following:

Patrice Neil – *Pro Se Plaintiff*
1410 Wood Road, Apt. MH
Bronx, NY 10462

/s/ Aaron R. Easley
Aaron R. Easley, Esq.
Attorneys for Defendant,
Credence Resource Management, LLC